

## **Privacy Policy**

This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website.

### **What personal information do we collect from the people that visit our website or app?**

When registering on our site, as appropriate, you may be asked to enter your name, email address, mailing address, phone number or other details to help you with your experience.

### **When do we collect information?**

We collect information from you when you register on our site or enter information on our site.

### **How do we use your information?**

We may use the information we collect from you when you register, respond to a survey or marketing communication.

### **How do we protect your information?**

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

### **Do we use 'cookies'?**

We use cookies for tracking and login purposes.

You can choose to have your computer warn you each time a cookie is being sent, or you can

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choose to turn off all cookies. You do this through your browser settings. Since browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookies.

If you turn cookies off, some of the features that make your site experience more efficient may not function properly and that make your site experience more efficient and may not function properly.

### **Third-party disclosure**

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable.

### **Opting out**

Customers can choose not to receive marketing messages or opt out of future text message by replying Stop or email message by clicking the unsubscribe link on the emails. We send a weekly unsubscribe to our bank partner letting them know which customers have opted out of marketing messages.

### **California Online Privacy Protection Act**

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require any person or company in the United States (and conceivably the world) that operates websites collecting Personally Identifiable Information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. - See more at: <http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

### **How does our site handle Do Not Track signals?**

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

### **Does our site allow third-party behavioral tracking?**

It's also important to note that we do not allow third-party behavioral tracking.

### **COPPA (Children Online Privacy Protection Act)**

When it comes to the collection of personal information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under the age of 13 years old.

## **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

### **In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:**

We will notify the users via in-site notification

- Within 7 business days

## **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

### **We collect your email address in order to:**

- Send information, respond to inquiries, and/or other requests or questions
- Send you additional information related to your product and/or service

### **To be in accordance with CANSPAM, we agree to the following:**

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If there are any questions regarding this privacy policy, you may contact us using the information below.

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